

1 **THOMAS F. PITARO, ESQ.**

Nevada Bar No. 001332

2 601 Las Vegas Blvd. South

Las Vegas, Nevada 89101

3 (702) 382-9221

4 Attorney for Defendant

MILLICENT EPINO

5
6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 **UNITED STATES OF AMERICA,**

9 Plaintiff,

10 vs.

11 **MILLICENT EPINO,**

12 Defendant.

Case No. 13-MJ-00271-CWH

13
14
15 **STIPULATION TO CONTINUE PRELIMINARY HEARING**

16 **IT IS HEREBY STIPULATED AND AGREED**, by and between **DANIEL G.**
17 **BOGDEN, ESQ.**, United States Attorney, and **CRISTINA SILVA, ESQ.**, Assistant United
18 States Attorney, counsel for the United States of America, and **THOMAS F. PITARO, ESQ.**,
19 counsel for Defendant, **MILLICENT EPINO**, that the preliminary hearing in the above-
20 captioned matter, currently scheduled for July 22, 2015, at the hour of 4:00 p.m., be vacated and
21 continued for thirty days, or to a date and time to be set by this Honorable Court.
22

23 This stipulation is entered into for the following reasons:

24 1. The parties are finalizing the terms of a plea agreement. Additional time is needed
25 to get the plea agreement and change of plea date set.
26

27 2. Denial of this request for continuance of the preliminary hearing would prejudice
28

Law Office
of
Thomas F. Pitaro

LAS VEGAS, NEVADA
(702) 382-9221

1 both the defendant and the government and unnecessarily consume this Court's valuable
2 resources, taking into account the exercise of due diligence.

3 3. Additionally, denial of this request for continuance could result in a miscarriage
4 of justice.

5 4. The additional time requested by this Stipulation is excludable in computing the
6 time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18,
7 United States Code, Section 3161(b) and Section 3161(h)(8)(A), considering the factors under
8 Title 18, United States Code, Sections 3161(h)(8)(B)(i) and 3161(h)(8)(B)(iv).

9 5. There have two previous request for continuance of the preliminary hearing
10 granted herein.

11 **DATED** this 21st day of July, 2015.

12 /S/ Thomas F. Pitaro

13 **THOMAS F. PITARO, ESQ.**
14 Counsel for Defendant

15 /S/ Cristina Silva

16 **CRISTINA SILVA, ESQ.**
17 Assistant U. S. Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

Case No. 13-MJ-00271-CWH

6 vs.

7 MILLICENT EPINO,

8 Defendant.

9
10 FINDINGS OF FACT

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
12 Court hereby finds that:

13 **IT IS THEREFORE ORDERED** that the preliminary hearing in the above captioned
14 matter currently scheduled for July 22, 2015, at the hour of 4:00 p.m. be vacated and continued
15 to Thursday, August 27, 2015, at the hour of 4:00 p.m.

16 **DATED** this 22nd day of April, 2015.

17
18
19
20 
21 UNITED STATES MAGISTRATE JUDGE
22
23
24
25
26
27
28

Law Office
of
Thomas F. Pitaro

LAS VEGAS, NEVADA
(702) 382-9221